

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

UNILOC USA, INC; UNILOC 2017 LLC;	§	
and UNILOC LICENSING USA LLC,	§	Civil Action No. 2:18-cv-00289-JRG
	§	Civil Action No. 2:18-cv-00290-JRG
Plaintiffs,	§	
	§	PATENT CASE
v.	§	
	§	JURY TRIAL DEMANDED
AMAZON.COM, INC.; AMAZON WEB	§	
SERVICES, INC.; AMAZON DIGITAL	§	
SERVICES, LLC; AMAZON DIGITAL	§	
SERVICES, INC.; and AMAZON	§	
FULFILLMENT SERVICES, INC.,	§	
	§	
Defendants.	§	

**JOINT MOTION TO STAY PENDING COMPLETION OF INSTITUTED
INTER-PARTES REVIEW OF THE PATENT-IN-SUIT**

NOW COME Plaintiffs Uniloc USA, Inc.; Uniloc 2017 LLC; and Uniloc Licensing USA, LLC (together, “Uniloc”) and Defendants Amazon.com, Inc.; Amazon Web Services, Inc.; Amazon Digital Services, LLC; Amazon Digital Services, Inc.; and Amazon Fulfillment Services, Inc. (together, “Amazon”) (jointly referred to as “the Parties”) to file this joint motion asking the Court to stay all deadlines in this case pending the completion of the instituted inter partes reviews of the patents-in-suit in Case Nos. 2:18-cv-00289 and 2:18-cv-00290. Concurrent with this motion, the parties have also filed a joint motion to consolidate these two cases, which involve patents from the same family.

Uniloc has asserted that Amazon infringes United States Patent Nos. 7,535,890 (the '890 Patent) and 8,724,622 (the '622 Patent). Third-party Samsung Electronics America, Inc., filed a petition for inter partes review of the '890 Patent, which was instituted on February 6, 2018. *See* IPR2017-01802 (Paper 8). Additionally, third-party Apple Inc. filed a petition for

inter partes review of the '890 Patent, which was instituted on May 25, 2017. *See* IPR2017-00221 (Paper 9). Two other inter partes reviews of the '890 Patent instituted from petitions brought by third-party Snap Inc. (IPR2017-01612) and third-parties Facebook, Inc., and WhatsApp, Inc. (IPR2017-01636) were joined into IPR2017-0021. *See* IPR2017-00221 (Papers 14 and 15). On May 23, 2018, the PTAB issued a Final Written Decision in IPR2017-0021 finding claims 1–6, 14, 15, 17–20, 28, 29, 31–34, 40–43, 51–54, 62–65, and 68 of the '890 patent to be unpatentable. *See* IPR2017-0021 (Paper 74). On June 22, 2018, Uniloc filed a request for rehearing. *See* IPR2017-0021 (Paper 64).

Third-parties Facebook, Inc., and WhatsApp, Inc., filed two petitions for inter partes review of the '622 Patent, which were instituted on January 19, 2018. *See* IPR2017-01667 (Paper 50) and IPR2017-01668 (Paper 49). Third-party Samsung Electronics America, Inc., also filed two petitions for inter partes review of the '622 Patent, which were instituted on February 6, 2018. *See* IPR2017-01797 (Paper 8) and IPR2017-01798 (Paper 8).

To conserve resources of this Court and the Parties, the Parties wish to stay this litigation pending completion of IPR2017-00221, IPR2017-01802, IPR2017-01667, IPR2017-01668, IPR2017-01797, and IPR2017-01798.

The Parties propose to file a joint status report within 10 days of the PTAB's issuance of its last final written decision relating to U.S. Patent Nos. 7,535,890 and 8,724,622, in light of which the Court will determine whether the stay should then be lifted.

Dated: August 10, 2018

Respectfully submitted,

s/ James L. Etheridge

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CERTIFICATE OF SERVICE

I certify that on August 10, 2018, the foregoing document was filed electronically and served upon all counsel of record via the Court's CM/ECF filing system in accordance with the Federal Rules of Civil Procedure.

s/ James L. Etheridge
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